

TECHNICAL REVIEW DOCUMENT OPERATING PERMIT 95OPJE111

to be issued to:

Ball Metal Beverage Container Corp.
Jefferson County
Source ID 0590010

Prepared by Geoffrey D. Drissel
September 4, 2007

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued April 1, 2003. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted August 30, 2007, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

The Ball Metal Beverage Container Corp. facility produces aluminum cans and ends from continuous aluminum sheets and aluminum end stock. The facility currently operates three can lines and four end lines. The major processing steps consist of cup extrusion, can forming, can washing and drying, ink and overvarnish application and curing, internal coating and curing, and can end manufacture and attachment. The plant equipment includes cuppers, trimmers, washers, coating application equipment, ovens and boilers.

The facility is located in Golden, west of Denver, in Jefferson County. The plant is located within 100 kilometers of Rocky Mountain National Park and Eagle's Nest National Wilderness Area. There are no affected states located within a 50 mile radius of the Site.

This facility is located in the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM10) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM10 and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

This facility is categorized as a NANSR major stationary source (Potential to Emit of VOC or NOx > 100 Tons/Year). The source is also currently considered to be a minor source for purposes of Prevention of Significant Deterioration (PSD) regulations (Potential to Emit < 250 tpy). Facility-wide potential and actual emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (tpy)</u>	<u>Actual 2004 Emissions (tpy)</u>
NOx	15.0	7.7
VOC (manufacturing)	147.7	58.3
VOC (clean up)	25.0	10.3
CO	12.6	6.5
PM ₁₀	36.8	1.5
Particulate	36.8	1.5

Potential emissions are taken from the current Operating Permit for this facility. Actual emissions are taken from a report of a facility inspection conducted on December 16, 2004.

The Title V renewal application was due on April 1, 2007. It was submitted on August 28, 2007, and was considered complete. The applicant has indicated that the facility is not subject to 112(r), the Accidental Release Prevention Program of the Federal Clean Air Act.

III. Emission Sources:

Source Requested Modifications

The source did not request that any changes be made to the Operating Permit:

Other Modifications

The Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to this Operating Permit. These changes are as follows:

- The PSD language was revised to reflect the current regulation citations.
- Appendix B and C were revised to reflect the current versions.